



October 6, 2022

Hon. Katherine Polk Failla
United States District Judge
United States District Court,
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

*Re: Request to Change Co-Signer of Bond
United States of America v. Michael T. Brown, Case No. 1:20-00524*

Dear Judge Failla:

We recently received a request from Bo Smith to be removed from the bond in the above case.

We do not oppose the request because the home owned by Joyce and Gordon Brown and the collateral to be added by Geoffrey McLaughlin, III, a valuable classic car exceed the security necessary to secure the \$500,000 bond.

Email communications with Mr. Ravi indicate that the Government is satisfied with the collateral and does not oppose this motion.

Accordingly, we request the Court continue the bond but remove Bo Smith as a co-signer of the Bond.

Thank you for your consideration.

Respectfully,

/s/ Stephen R. Cochell
Stephen R. Cochell

Copy: Mike Brown
Sagar Ravi

Application GRANTED. Defendant shall confer with the Government regarding the necessary paperwork to substitute Geoffrey McLaughlin, III for Bo Smith, and shall thereafter file such paperwork with the Clerk's Office.

The Clerk of Court is directed to terminate the pending motion at docket number 98.

Dated: October 10, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE